

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BASIA GOSZCZYNSKA a/k/a BARBARA FEDOROWICZ,

Plaintiff,

-vs-

**Civil Action No. 1:22-cv-09345-JHR**

ARCADIA EARTH LLC and  
INFORMA MARKETS FASHION  
(EAST) LLC

Defendants.

**DECLARATION OF TODD NOSHER IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

**I, TODD M. NOSHER, ESQ., of full age, hereby state as follows:**

1. I am an attorney at law in the State of New York and Partner at Calhoun, Bhella & Sechrest LLP.

2. I submit this Declaration in support of Defendants Arcadia Earth LLC (“Arcadia”) and Informa Markets Fashion (East) LLC (“Informa”) (collectively, “Defendants”) Motion to Dismiss Plaintiff Basia Goszczynska’s (“Plaintiff”) First Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(1).

3. Attached hereto as Exhibit 1 is a true and correct copy of the security Disturbance Report for the September 18, 2022 incident at the Javits Center involving the Plaintiff (the “Incident”).

4. Attached hereto as Exhibit 2 is a true and correct copy of still images from video taken of the Incident.

5. Attached hereto as Exhibit 3 is a true and correct copy of a video taken of the Incident. Exhibit 3 will be provided to the Court and Plaintiff via thumb drive sent via overnight mail and/or through Share Drive.

6. Attached hereto as Exhibit 4 is a true and correct copy of a text message from Plaintiff to Valentino Vettori.

7. Attached hereto as Exhibit 5 is a true and correct copy of an email correspondence between Plaintiff and Lea Lennox.

I declare under the laws of the United States of America that the foregoing is true and correct.

Dated: March 7, 2023



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Todd M. Nosher